

MEMORANDUM



DATE: 2 February 1998

SUBJECT: Daelyte Service Company
MID 006 537 336

TO: Steve Murawski, Assistant Regional Counsel
Office of Regional Counsel

FROM: Diane Sharrow, Environmental Scientist
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

As you are aware, this Facility was referred to Region 5, Superfund Division on 12 June 1996 for a possible removal. Superfund Division declined due to the lack of information. In December 1997, I obtained access to the Facility to gather information on illegal storage and possible releases of RCRA hazardous waste. I was assisted in doing a Site Inspection by a RCRA Contractor/Subcontractor: TechLaw/Metcalf and Eddy. Superfund Division sent their own Contractor, Ecology and Environment, to complete an assessment. RCRA completed a Site Inspection Trip Report, dated 22 January 1998. I have not seen any documentation that Superfund generated from the site visit.

As we discussed on 27 January 1998, RCRA has made the following determinations based on the Report:

- ~ that the illegally stored waste solvents that were the subject of the original Complaint are no longer present, but the waste paint remains in AOC-C in containers of varying conditions, including some that have leaked. In addition, AOC-C contains an open drum of what appears to be fuel oil, there is liquid on the floor, there is an inaccessible floor drain, and there are mercury containing fluorescent light ballasts.;
- ~ that there is corrosive material contained in AOC-D, consisting of a corroded drum and containers.;
- ~ that samples from unidentified wastes in a portion of the original warehouse cannot be obtained, and the floor drains and floor pit cannot be investigated, based on the advice of a M&E Structural Engineer that there is an immediate threat of collapse of this portion of the building.;
- and
- ~ that two of the three USTs appeared to contain combustible "product", but a determination as to whether these USTs were leaking could not be made.

RCRA is concerned that a "new" RCRA action at the Facility will not accomplish an immediate removal or corrective action. We believe that there are imminent threats to human health and the environment that warrant a further assessment by Superfund at the Facility. These threats include the imminent threat of the collapse of the old warehouse. Collapse would not only endanger the occupant(s) of the wood frame house immediately adjacent, but would cause the release of the contents of AOC D, and possibly AOC C because the east addition to the building shares a common wall with the old warehouse. Collapse of the buildings could effect sewer, plumbing, wiring and electrical lines. Downed lines and exposed wiring combined with combustible materials, presents a fire hazard, and could cause airborne releases. In addition, water and the materials released could find their way into the floor drains, the pit, water lines and sewers. We could not determine where the drains and the pit discharge; they may or may not be connected to city sewers. The USTs may also be leaking and the vapors could enter the basements of the two frame houses and adjacent two-story brick building. Collapse of the warehouse would not only complicate assessment and removal of the three USTs, but could combined with vapors cause a secondary explosion.

RCRA is not sure what information the Superfund Contractor collected. But before we re-refer the Facility to Superfund, we would like to discuss these threats, as well as further actions on the Judicial Decree. Please contact me at 6-6199, to arrange a date and time for these discussions.

CC: File